

## **REMARKS**

Claims 1-20 are pending.

Claims 1-20 are rejected.

In the office action dated 11 May 2009, claims 1-5, 10-16 and 18-19 are rejected under 35 USC §103(a) as being unpatentable over Brady U.S. Patent No. 7,114,171 in view of Scott U.S. Patent No. 5,790,787 and Loui U.S. Patent No. 6,813,618 (collectively, the "cited documents"). The '103 rejection is respectfully traversed.

Base claim 1, as previously presented, recited a vehicle seat for supporting a passenger. The seat includes a frame, a video monitor mounted on the seat frame, and a digital processor operatively connected to the video monitor for processing a digital input for display as an image on the video monitor. The digital processor is programmed with image editing software for allowing a passenger to organize and edit any one or more images from the digital input.

The vehicle seat of claim 1 is not limited to any particular type of vehicle. As but one example, the vehicle seat of claim 1 may be used in a commercial aircraft for in-flight entertainment. Airline companies have long sought ways of keeping passengers occupied during long flights. The vehicle seat of claim 1 provides a form of entertainment for those passengers who don't travel with their notebooks or don't want to unpack their notebooks. Moreover, the vehicle seat of claim 1 makes it more convenient to edit images than a notebook, since the frame-mounted video monitor doesn't occupy a tray table or a passenger's lap. The cited documents do not teach or suggest such a system that provides these benefits.

Brady discloses an In-Flight Entertainment (IFE) system including a line replaceable unit (LRU) 100 mounted in close proximity to a seat 750 and connected between a user interface 200 and a network 1500 (see Fig. 1a). The LRU 100 provides

audio to a passenger. An LRU 150 may provide video to an optional display 650 mounted to a seat back 700 (see Figure 1b). A network server 450 may be located on the LRU 150 (col. 9, lines 3-6). The server 450 presumably serves video to the display 650.

The LRU 100 “is, in an embodiment, a seat electronics box 2160” (col. 8, lines 57-59). The seat electronics box 2160 allows a passenger to connect a laptop computer into the network (col. 15, lines 18+). Brady does not teach or suggest that the laptop is connected to the optional display.

Regardless, Brady does not teach or suggest an IFE system that allows passengers to perform image editing. Brady discloses a system that, among other things, provides video to a display 650.

**The other two documents – Loui and Scott – do not suggest a logical jump from a system that displays videos to a system that allows passengers to organize and edit images.** Loui discloses a digital album application 10. The application 10 can be run on a processing unit 4 such as a personal computer (col. 4, lines 32). The computer can be connected to a network interface 6.

Scott discloses an aircraft network including a CD ROM player at each of a number of user stations (Abstract, lines 1-4). Audio and video application software is stored on CD ROMs and accessed by playing the CD ROMs at the user stations (Abstract, lines 4-8). Each user station has a display device and circuitry for interfacing with a CD ROM player. Figure 8 illustrates two units of a conventional CD-ROM player in which the electronics of the two units have been repackaged for mounting within an arm rest 50 between two seats of a passenger aircraft (col. 7, lines 22-25).

LCD display devices 45 and 46 are also mounted within the seat arm 50 (col. 7, lines 26-32). The display devices 45 and 46 are connected to the CD-ROM players via the interface circuitry (col. 7, lines 46-50). In another embodiment, the CD-ROM

players have their own LCD screens (col. 6, lines 36-37). Scott does not disclose any other embodiments in which a CD-ROM player is connected to a seat-mounted video monitor.

Moreover, Scott does not teach or suggest that the CD ROM players are image processing devices. Loui does not teach or suggest image processing software that can be run from a CD ROM.

Thus, the cited documents do not teach or suggest a vehicle seat including a display mounted to a seat frame and an image processing device connected to the display. Because the cited documents do not produce a vehicle seat having all of the features of claim 1, the '103 rejection of claim 1 and its dependent claims 2-17 should be withdrawn.

The '103 rejection should be withdrawn for the additional reason that the office action does not provide a clear articulation of obviousness. The office action does not clearly articulate how Brady's LRU can be modified to provide image editing capability. According to col. 9, lines 39-42 of Brady, an LRU running a network server program 500 might be a digital server unit. That is, the server unit serves files (i.e., deliver files upon request), it does not provide passengers the capability to organize and edit the image files.

The office action doesn't provide a clear articulation of how the teachings of Scott can be used to modify the system of Brady. It seems to suggest that Brady's LRU (a seat electronics box) is equivalent to a CD-ROM player, but neither Brady nor Scott support the suggestion.

The office action does not explain how Loui's image editing software can be utilized by a CD-ROM player. Loui doesn't teach or suggest a CD ROM player having the capability of a computer.

Thus, Scott and Loui do not teach or suggest, and the office action does not provide a clear articulation of a logical jump from a system that displays video images on a screen to a system that allows a passenger to perform image editing at his or her seat. For this additional reason, the '103 rejection of claim 1 and its dependent claims 2-17 should be withdrawn.

Nevertheless, claim 1 has been amended to clearly distinguish over Scott. Amended claim 1 recites that the combination of video monitor and processor that allows a passenger to organize and edit any one or more images from the digital input "without having to connect an external image processing device to the video monitor to process the digital input." Scott clearly discloses an external device (a CD-ROM player) connected to a video display (even though the player is not connected to a seat-mounted display). Brady discloses a laptop connected to a network (even though it doesn't suggest a laptop connected to display 650) and an LRU that runs a web server.

The 'office action does not establish prima facie obviousness of base claim 18. As discussed above, the cited documents do not teach or suggest a digital processor operatively connected to a seat-mounted video monitor for processing a digital input, the digital processor programmed with image editing software for allowing a passenger to organize and edit any one or more images from the digital input. Therefore, the 103 rejection of base claim 18 and its dependent claims 19-20 should be withdrawn.

Brady does not teach or suggest image editing capabilities integrated with an aircraft in-flight network. For instance, Brady doesn't teach or suggest the various types of entertainment that a passenger could enjoy with image editing software. Brady doesn't teach or suggest editing the passengers own digital images (claim 4), creating a digital travel log (claim 6), editing digital images taken by an externally-mounted aircraft camera (claim 8) or a seat-mounted camera (claim 10), or mixing personal images with content provided by the aircraft (claim 20). For these additional reasons, the '103 rejections of claims 4, 6, 8, 10 and 20 should be withdrawn.

The Examiner is strongly encouraged to contact the undersigned to discuss any remaining issues before mailing another office action.

Respectfully submitted,

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Date: August 11, 2009